

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

WENGUI GUO	:	
a/k/a MILES KWOK	:	
Plaintiff,		
v.	:	Civil Action No. 1:18-cv-00174-LO-TCB
YELIANG XIA	:	
Defendant.	:	

DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS

Defendant Yeliang Xia ("Xia") requests that Plaintiff Wengui Guo a/k/a Miles Kwok ("Guo") respond to the following requests for production of documents, in writing and under oath, within thirty (30) days of service, in accordance with the following Definitions and Instructions.

INSTRUCTIONS:

1. Pursuant to Rule 34 of FRCP, Defendant Yeliang Xia (Xia), a pro se litigant, submits the following request for production of documents from Plaintiff Wengui Guo (Guo).
2. As used herein, the term "You" or "Your" means Plaintiff Wengui Guo a/k/a Miles Kwok ("Guo") or the same person with more than nine names appeared in different legal documents in USA and other countries, those names and identifications that Plaintiff possessed and keep using including but not limited to following: Haoyun Guo, Ho Wan Guo, Kwok Ho Wan, Kwok Ho, Gwo Wengui, Wan Gue Haoyun.
3. As used herein, the term "Plaintiff" means Plaintiff Wengui Guo a/k/a Miles Kwok.
4. Pursuant to Rule 34(a), Defendant acknowledge that these requests are limited to the scope of FRCP Rule 26(b), and requests that when Plaintiff is unable to produce certain documents because they fall outside of such scope, Plaintiff will provide a brief explanation as to the reason why the documents fall outside the scope of the request.
5. Pursuant to FRCP Rule 34(b)(2)(E), Defendant requests that when Plaintiff does produce the requested documents, including electronically stored information (ESI), Plaintiff will produce such documents or ESI as they are kept in the usual course of business or will organize and label them to correspond to the categories in the request.
6. Defendant requests that Plaintiff make a good faith effort to produce any and all requested documents that are readily ascertainable from Plaintiff.

DEFINITIONS:

A. PRIVILEGED DOCUMENTS

Any document described herein that is withheld based on privilege, work product, or any other grounds is to be identified in writing by data, type of document (letter, report, etc.), title,

addressee, sender, all individuals who received a copy, topic covered, and the grounds alleged for withholding such document.

B. POSSESSION, CUSTODY OR CONTROL

Where documents in the possession, custody or control of any firm, corporation or partnership are requested, such request also pertains to documents in the possession, custody or control of employees, agents, next friends, guardians, representatives, trustees and, unless privileged, attorneys of such firms, corporations or partnerships.

C. FURTHER DEFINITIONS (Governing all three pieces of discovery documents, repetition omitted)

1. As used herein, the term “document(s)” shall mean the original and all copies that are different in any way from the original (whether by interlineation, receipt stamps notation, indication of copies sent or received, or otherwise) and all attached or annexed materials to any written, typewritten, handwritten, printed, graphic, photographic or recorded material as well as all computer e-mails, data files, Internet web pages, tapes, disks, inputs or outputs, and other computer-readable records or programs, transcripts and copies and reproductions thereof, however, produced or reproduced, now or at any time in your actual or constructive possession, custody or control.

The term “document(s)” shall specifically include, but not be limited to, correspondence, e-mails, telegrams, facsimiles, telexes, memoranda, memoranda or records of meetings, conferences, telephone or other communications, pamphlets, books, notes, reports, studies, transcripts, indexes, accounting records of any kind, including bank examination reports whether state or federal, filings, records, charts, tabulations, lists, analyses, graphs, diagrams, estimates, minutes (including board and loan committee minutes), tapes, photographs and photographic films, sound recording tapes, phonographic records, video tapes, compact disks, CD-ROMs, data compilations from which information can be obtained or can be translated into a form reasonably usable, as well as any contracts or agreements, and records of every kind and type, including any information formerly or presently kept by any method of electronic data processing or magnetic tape storage medium, including the printed output of any such electronic data processing equipment or magnetically stored information.

This definition is not meant to be exhaustive or limiting in any way. The term includes all electronically stored information and paper documents, and specifically incorporates, without limitation all items referenced in Fed. R. Civ. P. 34(a)(1)(A).

“Document,” “documents,” “record,” “records,” “written communication,” and “written correspondence” means all data, papers, and books, transcriptions, pictures, drawings or diagrams or every nature, whether transcribed by hand or by some mechanical, electronic,

photographic or other means, as well as sound reproductions of oral statements or conversations by whatever means made, including written papers or memoranda which summarize oral conversations, whether in Plaintiff's actual or constructive possession or under Plaintiff's control or not, relating to or pertaining to or in any way to the subject matters in connection which it is used and includes originals, all file copies, all other copies, no matter how prepared and all drafts prepared in connection with such writing, whether used or not, including by way of illustration and not by way of limitation, the following: books; records; reports; contracts; agreements; video, audio and other electronic recordings; memoranda (including written memoranda of telephone conversations, other conversations, discussions, agreements, acts and activities); minutes; diaries; calendars; desk pads; scrapbooks; notes; notebooks; correspondence; drafts; bulletins; electronic mail (e-mail); facsimiles; circulars; forms; pamphlets; notice; statements; journals; postcards; letters; telegrams; publications; inter and intra-office communications; photocopies; microfilm; maps; drawings; diagrams; sketches; analyses; transcripts; electronically stored information (ESI) and any other documents within defendant's possession, custody or control from which information can be obtained or translated, if necessary, by detection devices into reasonably usable form, i.e. typed in English.

2. "Electronically stored information" and "ESI" means any Information on operational systems including accounting, financial, distribution, or manufacturing systems; E-mail; Instant Messages (IM); Web pages; text messages; cell phone data; computer databases; erased, fragmented or damaged data; Youtube videos; Twitter and Facebook postings and messages; Guo.media postings and messages, and anything stored on computer or other electronic means located on or in, but not limited to cache memory; optical disks; magnetic tapes/back-up tapes; magnetic disks (hard drive, floppy disks, etc.); cell phones; IM tools; or USB drives.

3. Requests phrased in either the disjunctive ("or") or conjunctive ("and") both should be responded to in the manner that makes your response inclusive rather than exclusive.

4. Words used in the singular should be understood to mean also the plural and all words in the plural should be understood to mean also their singular so that to make your answer inclusive rather than exclusive.

5. The word "all" means any and all.

6. The word "any" means any and all.

7. As used herein, the term "relating" means, as applicable, evidencing, connected with, regarding, concerning, supporting, refuting, comprising, constituting, discussing, mentioning, commenting on, referring to, embodying, constituting, or in any way pertaining to in whole or in part. "Relating to" or "related to" means about, alluding to, analyzing, constituting, containing, concerning, connected with, commenting on, dealing with or in any way pertaining to, describing, discussing, embodying, evidencing, identifying, incorporating, mentioning, referring to, reflecting, regarding, showing, or with respect to.

8. As used herein, the term "person(s)" shall mean any natural person, any business entity (whether a corporation, partnership, limited liability company, or other business association), or any governmental body, agency, bureau, board or department, any partnership, association, joint

venture, sole proprietorship, firm or other business enterprise or legal entity and means both the singular and plural.

9. *The “Master” as used herein shall refer to any and all, yet not necessarily are, have been, and were, handlers, principals, “Leaders”, “Older Leader(s)” in active duty or retired, “Current leaders in active duty, “Organization(s) in operations”, either domestic or global, geographically located in either Far East or Middle East. “Principals” may be including, but not limited to, a totalitarian political institutions, such secret police apparatus as of China’s State Security Ministry, and their controlled financial institutions, funds, foundations, trusts, corporations, money laundering pools, underground banks and/or their offshore financial institutions, their underground control and command headquarters; and/or any international terrorist organizations such as Al Qaeda, ISIS, or such terrorist organization affiliated Middle Eastern Petroleum funds, international money laundering network’s “leaders” and “organization”; Global Anti-Semites Institutions’s chieftain and their affiliated “organization’s “leaders”, Any and all domestic and international Creditors/lenders run by Middle East Anti-Semite/Terrorist organization and their supporters and backers from Beijing, the People’s Republic., etc.*

10. *The “servants” as used herein shall refer to such natural persons who may or may not include such subordinating individuals that may probably including, but not limited to, such Foreign Agents, service providers, laborers, debtors, loaners, receivers, as Mr. Guo Wengui, his associates, assistants, employees, deputies, trustees, and all others who owed fiduciary duties to the Master or Masters.*

11. As used herein, the term “Complaint” shall mean the Complaint filed by Plaintiff Guo on February 15, 2018 in the U.S. District Court for the Eastern District of Virginia captioned: Wengui Guo a/k/a Miles Kwok v. Yeliang Xia, Civil Action No. 1:18-cv-00174-LO-TCB.

12. As used herein, the term “Amended Counterclaim” shall mean the Amended Counterclaim served by Defendant Xia on September 23, 2018 to the Counsel for Plaintiff via email and filed officially on Dec 5, 2018 in the U.S. District Court for the Eastern District of Virginia captioned: Wengui Guo a/k/a Miles Kwok v. Yeliang Xia, Civil Action No. 1:18-cv-00174-LO-TCB.

13. As used herein, the term “communication(s)” shall mean the transmittal or receipt of information in any form, including, but not limited to, any written or oral communications, in-person conversations, telephone conversations, meetings, letters, memoranda, notes, e-mails, voicemail, text messages and instant messaging, social networking websites (including, but not limited to, Facebook, MySpace, Twitter, YouTube, Instagram, Snapchat, and LinkedIn), and telegram, facsimile, telegraphic, and telex communications.

14. Each request should be construed independently. No request should be construed by reference to any other request for the purpose of limiting the scope of your response to such request.

15. “Copies of” as set forth in the Instructions to this motion means authentic duplicates of the originals as noted, kept, maintained, and organized by Plaintiff in the ordinary course of business.

16. "Discussion," "discussions," "discuss," "discusses," "mention," "mentions," "describe," "describes" means any and all inquiries, conferences, conversations, negotiations, agreements or other forms or methods of oral communication or such dialogue sent via e-mail, facsimile, letter, telegram, or other written communication.

17. "Include" and "including," mean "include without limitation" and "including without limitation," respectively.

18. Requests stated in the present tense include the past tense and vice versa.

19. Use of a verb in any tense shall be construed as the use of the verb in all other tenses.

20. In the interest of time, before objecting to any request as vague or ambiguous, please contact the undersigned counsel to clarify what was intended by the request.

21. If, in responding to any request, you claim an objection or other basis for not admitting or denying the request, respond to all aspects the request to which your objection does not apply and separately state what part of the request is objectionable.

REQUESTED DOCUMENTS

1. Any and all such legal documents, such as government issued vital records, travel documents, legal status records that shows your name is Ho Wan Kwok, Miles Kwok, Wengui Guo, and Hao Yun Guo, and your alter egos are including, but not limited to "Golden Spring (New York) Ltd., Shiny Times Holding Ltd., Spirit Charter Investment Ltd., Hong Kong Eastern Profit Corp. Ltd; ACA Capital Group Limited.

Any and all information, documents and records related to Plaintiff's birth date, real names, Chinese and English names, identity, nationality and residency status in China, Hong Kong, Japan, Ahu Dhabi, Britain, Canada, United States and other countries or regions he's lived in or for which he holds passports.

Any and all such legal documents, such as government issued vital records, travel documents, legal status records that shows you are a U.S. citizen as you have repeatedly alleged and claimed to the public, or a citizen of any states, pursuant to Rule 26(b)(3)(C).

2. Any and all information, documents, verdicts and records related to Plaintiff's arrest and other criminal records in China and other countries or regions, including but not limit to conviction of commercial fraud in 1991, and the arrests, charges and convictions of his companies and his employees at Beijing Pangu Investment Company, Zenith Holding Company, which were in the Plaintiff's control; Any and all such Documents as criminal and civil seizures, forfeitures, and of confiscation for Hong Kong Dollar 36.2 Billion according to France News Agency, equalizing approximately US\$4.2 billion by Hong Kong High Court of Criminal Justice for criminal conviction against you and your accomplices for the high felony crimes of money laundering and in conspiracy with his son and daughter and their related associates, deputies, proxies, alter egos, co-defendants, etc.

3. Any and all charging documents, indictments, court verdicts and judgments, for either convicted, sentenced or indicted felony crimes including, but are not limited to, rape, sexual assaults, sexual molestations, bribery, frauds, kidnaping, lynchings (assaults), distortions, money laundering, forgery, perjury, illegal expropriations of others' properties, mail fraud and wire fraud, obstruction of justice and tampering witnesses, in the United States, Hong Kong, The United Arab Emirates, China and other countries or regions.

3. Given to your claimed damage totaling \$5million against Defendant and Defendant also raised counterclaims of \$12.25 million USD for monetary damages, please provide such evidence to prove your ability to satisfy a judgment if a judgment upon counterclaims in favor of Defendant/Counter Plaintiff: Proof of all your such presentable and legitimate income as your salary, dividends, royalty, etc., which reflect your lawful and suspicion free income earned in the United States, and reflected in your annual tax returns, W-2s, Form 1099 and other transaction sheets at least within the numerical limitation of your claimed amount pursuant to Rule 26 (b) (1) in connection to Rule 26 (a)(1)(A)(iv), subject to Rule 34, FRCP:

Any and all records, documents, accounts, balance sheet, profit-loss statements and all such other information related to Plaintiff's wealth, assets, cash, gold, silver, diamond and related products and artwares, jewelry, antiques, collection of paintings and works of calligraphy by ancient and

modern artists and calligraphers of fame, collection of stamps, arms (for private defense or collection) and property (including but not limit to real property, luxury cruise, private jets, stocks, bonds and banking accounts) in the United States, and all money transfers over \$10,000,00 flowing to and from the United States since 2013. pursuant to Rule 26 (b) (1) in connection to Rule 26 (a)(1)(A)(iv), subject to Rule 34, FRCP.

4. Any and all documentary or testimonial evidence which may help you prove that you , though having no legitimate, presentable job or income in the United States, yet you have such excellent and amazing credit to lawfully loan, borrow, convey, take tens of, and hundreds of millions of U.S. dollars, to pay your seven or eight digits of expenses covering attorney fees for suing dozens of pro-democracy activists, human rights campaigners, maintaining private jets and luxury cruise, and your extravagant life style.

You testified under penalty of perjury in Guo v. Guo case that you are a person having no wealth or assets while living in red by loans, such a “poor man declaration under oath did not bother you to boast in your video speech that you consume your favorite cigar(which costs \$5000 USD per piece and top level wines which costs more than \$100,000 USD per bottle, not to mention that you boasted of ordering hundreds of suits from top notch designers and tailors in the world, and it costs at least several thousand USD per suit as you described in your video speech), assuming *arguendo* these astronomic funds are free from Chinese Secret Police’s overseas depository, or petroleum funds by either totalitarian treasury of the Far East or Terrorist funds from the Middle East, or human organ harvesting funds, etc. which flowed into USA through underground channels, please provide any and all documents as exculpatory evidence pursuant to Rule 26 (b) (1) in connection to Rule 26 (a)(1)(A)(iv), subject to Rule 34, FRCP. And Rule 26(b)(3)(C) FRCP.

6. Record shows that you or your alter ego paid Strategic Vision US LLP \$1million in cash being laundered from a Hong Kong based China-Arabic Fund as an upfront payment to allegedly induce or coerce the latter to “engage in criminal activities” that is outlawed; \$8million cash reserve for contract balance owing to SV (Case Number:18-cv-02185-JGK, NYED, 2018) \$700,000.00 to attorney David Boies, Esq., (David Boies Law Firm Sues Chinese Exile Guo Wengui over Unpaid Legal Bills—by Nathan Vardi, Forbes,11/26/2018) \$19,999.00 in bribery trading perjury in wire frauds paid to a middle aged female California Restaurant owner Ms. Xxx’s false charge of so-called “sexual molestation” to defaming Defendant, Several monetary reserve for \$100,000.00 each in the similarly alleged “wire fraud bribery trading perjury rewards”, monetary cash reserve of \$3,000,000.00 in alleged trade of “Guo, Zhao, Ye’s so-called investigative service” (Case Number_NY Supreme Court Index: 151251/2019); please provide documents to legitimize the source of all these cash payments/cash reserves and of their circulating routes, channels. Any and all documentary an testimonial evidence that helps prove that afore-listed expenditure or reserve of the cash is not from the ultimate source accumulated from your alleged expropriation drive in collusion with PRC’s Secret police in which you are admittedly an integral part by looting numerous multibillionaire private entrepreneurs, including Mr. Qu Long, Li You, Zhang Hongwei, etc., leading to their loss of lives, freedom and properties in China, given to your under oath testimony that you are a man living on loans with no assets and wealth;

7. Any and all documents that proves with certainty that Plaintiff did not include Defendant Professor Xia into Plaintiff’s “Hitting-List” involving 92 individuals in his secret deal with SV. The 92-name hitting list, that you submitted to Strategic Vision USA Corp, together with \$1million retainer, requesting the latter to “engage criminal activities” in spying these 92 potential victims for their real time “geolocations” among other suspiciously terrorist agenda, by “remotely accessing” into their telecommunications, proving Defendant Xainmin Xiong is *not*

within the targeted subjects of the hitting list apparently prepared either for allegedly assassination or political blackmailing.

8. Documentary evidence of any factual and legal basis regarding your personal pledge to pour \$100 Million into what your publicly pronounced into "Rule under Law Foundation", to prove that such actual or projected funding is neither supplied by Arabic-China funds, nor disposed and used to pay legal fees pursuing 17 cases from coast to coast against Chinese political dissidents including Defendant Yeliang Xia, or spent in paying more "California victim" type in cash bribery in trading for fraud, pursuant to Rule 26 (b) (1) in connection to Rule 26 (a)(1)(A)(iv), subject to Rule 34, FRCP.

9. Any and all rebuttal materials covering the period between 2010 and the present in his defense against his key employee Ms. Wang Yanping's allegations that this Plaintiff has actually involved in numerous crimes including rapes, sexual assaults, fraud, kidnapping followed with illegal detention, bribery, money laundering, etc. Any and all such documents in which You demanded Ms. Yanping Wang to reverse, correct and apologize in writing issued by you or your attorney.

10. Any and all communications, correspondence, discussions and records between 2011 and the present between the Plaintiff and Qu Guojiao, an employee who was involved in Guo's money laundering in Hong Kong and alleged in video testimony that the Plaintiff conducted \$1.5 billion fraud from Abu Dhabi, while using such fruits of international money laundering to retain numerous professional spying firms to persecute Chinese prodemocracy dissidents including this defendant in the instant action.

11. Any and all communications, correspondence, discussions and records between 1993 and the present between the Plaintiff and the following Chinese government officials, allegedly with whose "leadership" Plaintiff has launched expensive, abusive and frivolous persecution campaign of three-dimensional "unlimited warfare" (Smear Campaign; frivolous litigations; wire fraud by offering dishonored grand bribery in trading for "sexual assault" false accusation, targeting almost all Chinese leading dissidents including this Defendant: Ma Jian, Tsar of Chinese Secret Police apparatus, Deputy Zhang Yue, head of political-legal committee of Hebei Province; Wang Youjie, Party Secretary of Zhengzhou City; Shi Faliang, head of Henan Transportation Bureau; Xiang Junbo, chairman of the China Insurance Regulatory Commission (CIRC) and chairman of the Agricultural Bank of China; Meng Huiqing, an official of CCDI (Central Commission for Discipline Inspection), Chen Gang, vice mayor of Beijing, Liu Yanping, Secretary for discipline inspection of the Ministry of State Security (minister level official).

12. Any and all communications, correspondence, discussions and records between 2000 and the present between the Plaintiff and Tony Blair, the Royal family of Abu Dhabi, the government officials of Abu Dhabi, who have ties with Plaintiff's involvement of ACA INVESTMENT FUND part of which was laundered into the United States to pay "Strategic Vision USA LLP" to coerce the latter to allegedly "engage in criminal activities" to spy on 92 people highly likely including both the above-named and this Defendant.

13. Any and all Documents involving or in relation to those 92 people name list and such related documents as instructions from “leaders” and “organization” to make sure that Defendant is not included in that hitting list involving 92 targeted people in such alleged “criminal activities”.
14. In the Complaint, you claims congregated damages of \$5 million against Defendant for the alleged harm you and your loved ones sustained; provide all documents of assessment and accounting, including itemized break-downs in support of your claimed dollar amount damage claim pursuant to Rule 26 (b) (1) in connection to Rule 26 (a)(1)(A)(iii), subject to Rule 34, FRCP.
15. Any and all such documents in exculpatory nature, documentary or testimonial evidence in writing that may closely or remotely help you to rebut such Mainstream Media’s reports including AP’s reports about your alleged rape, kidnaping and assaulting, including sexually assaulting your former employee Miss Rui Ma.
16. Any and all such documents in exculpatory nature, documentary or testimonial evidence in writing that may closely or remotely help you in support of your public acknowledgement that you kept Ms. Rui Ma in custody for only about 6 months rather than one year, pursuant to Rule 26(b)(3)(C).
17. Any and all such documents, such as government issued documents, sworn affidavits by eyewitnesses that may help you prove any rebuttals against public awareness that you were, have been and you still are a publicly known corroborates, accomplice, agents, and hit-man in active affiliation to communist China’s secret police organ MSS’s operation by “utilizing your resources and influence”, “dedicating your life” to safeguard communist dictator Xi Jinping in your 08/26/2017 letter of allegiance to the top leaders in Beijing, pursuant to Rule 26(b)(3)(C).
18. Any and all documentary or testimonial evidence that will, or will incline to, rebut such public knowledge, mostly from your own public statements, that you are acting to help Beijing to silence any and all dissidents’ voice, suppressing free dissident speech under 1st Amendment and Article 19, to keep a long line of dissidents to be ripped of both time and money, in 2-3 years, that you vowed in 02/20/2019 public video speech to favor your “older superiors” within the apparatus, namely, “Lao Lingdao” pursuant to Rule 26(b)(3)(C).
19. Regarding your numerous public video speeches, including your five-page signed 08/26/2017 letter of allegiance to “leaders” and “organization” that may help rebut that what you mentioned “leaders” and “the Organization” of the “Peop;e’s Republic” are not malignant totalitarians thugocrats, but they are benevolent ruling bloc to which all Chinese people should be called to help stabilize, pursuant to Rule 26(b)(3)(C).
20. Any and all documentary or testimonial evidence which may help you, for rebuttal purpose, to defend that neither you and your old superior (“Lao Lindao”) and intimate partner Mr. Ma Jian, nor Mr. Xi Jinping of “the organization” secretly dispatched from Beijing, is an integral part of China’s totalitarian mass murder machine, but the benevolent building bloc of the free mankind. Therefore, your past and continuing service to them by publicly vowing to dedicate all of your “resources and influence”, including your life, will be good for freedom;

21. Any and all documentary or testimonial evidence which may help you to rebut such charges that you have magically built up your multibillion dollars red (bloody) business empire, including your empty-handedly took tens of billions from National Security Exchanges and Xinhua life Insurance, being backed up by China's secret police apparatus under such secret police Tsar as Zhou Yongkang and Ma Jian, upon corpses and remains being sunk in pool of blood of your competitors in such a long line of dictatorship backed expropriation drive. .
22. Any and all documentary or testimonial evidence which may help you establish your charge and accusation in public forum and in this courthouse that Defendant has such sexually transmitted disease as HPV pursuant to Rule 26(b)(3)(C).
23. Any and all documentary or testimonial evidence which may help you substantiate your charge in public forum that Defendant had committed sexual assault or sexual molestation against a California female owner of a Restaurant that prompted you to promise a lucrative reward of US \$100,000 with cash payment to any woman who accuse Defendant of rape or sexual molestation as far as she's willing to sign an agreement with your attorney and help with exposure of accusation against Defendant, pursuant to Rule 26(b)(3)(C).
24. Any and all documentary or testimonial evidence which may help you to exonerate such wire fraud suspicion with justification that your rejection to pay in full what you offered on web by \$100,000.00 for each count of sexual assault/harassment charge for each woman victim when that California female restaurant owner asking your honoring your offer in full, ending up your actual payment less than \$20,000.00 to that woman; Any and all documentary or testimonial evidence which may help you to rebut that your scam of \$100,000.00/pc bribery in trading fraudulent testimony targeting numerous victims including this Defendant is not a criminal conspiracy of fraud, obstruction of justice and tampering of witnesses, but rather, they are good for your alleged dream in "rule by law";
25. Any and all documentary or testimonial evidence which may help you substantiate your charge in public forum that Defendant was a sexually preying "beast" rather than a "professor" quoting an alleged sexually victimized female student back to Peking University, Beijing China, pursuant to Rule 26(b)(3)(C).
26. Any and all documentary or testimonial evidence which may help you legitimize your publicly announced covert act to target and include children of Defendant Xia, of Defendant Xianmin Xiong, of Defendant Teng Biao, in your hitting list you have conspired with such spying firm as SVs, in order to place under peril or enormous risks, pursuant to Rule 26(b)(3)(C).
27. Any and all documentary or testimonial evidence which may help you legitimize your covert action in conspiracy with Strategic Vision America LLP, an Las Vegas Investigative Firm, to circumvent the Law of the United States track on 92 USDOS records protected people, presumably including Defendant, regarding their "itineraries, addresses and lodging, means of transportation, names of carries, geolocation, major events and significant contacts videos and audio that can be accessed remotely ". Any and all documentary or testimonial evidence which may help you to rebut that such the above conspiracy is not part of your project under the code name of "China Dream" or "Rule by Law" publicized on August 26, 2017?

28. Any and all documentary or testimonial evidence that helps prove that the PRC's MSS Deputy Minister Ma Jian's confession referring his collusion with you in looting and expropriating a long line of multibillionaire private entrepreneurs leading to their loss of lives, freedom and properties in China is not part of illegal expropriation by Chinese secret police of which you are an integral part, but rather these are showcasing your ceaseless/tireless efforts to advocate for "rule by law" of Chinese character.

29. Any and all communications, correspondence, documents, wiring records, mostly from Hong Kong, "the People's Republic" and the United Arab Emirates reflecting your token financial supports to the following your current and former helpers and/or accomplices to aid and abet what you advocated "rule by law in China" project under the code name of "China Dream": Strategic Vision USA LLP, Tang Baiqiao, Qinming Jin (aka "Mangliuzi", a web name), Cao Changqing, Zhuang Liehong, Zeng Hong, Wei Lihong (Sarah, twitter@sarawei3), Wang Dinggang, ("Lu De", a web name) Yuan Hongbing, Xiang Lin, Peter Shi, Geng Yan and Qiu Yueshou.

30. Any and all documentary or testimonial evidence which may help you to prove that you are a Chinese nation's "pioneer political dissident" using YouTube and Twitter to fight for the rule by law in China, and since 2015 has "regularly spoken on YouTube and Twitter about Chinese political and human rights issues", and engaged in highly acclaimed "whistle-blowing" activities disclosing the all such nationally concerned corruptions on summit level of Chinese ruling bloc on summit level and you have approximately 491,000 audience whenever you held out to general public on daily basis.

31. Any and all communications, correspondence, documents and records which may help you to rebut such criminal charge leading to rehabilitation of your alleged expropriation of multibillion dollars from Minzu(National) Security Co. by a forced deal, as stated in such verdict rendered by Intermediate Court of Dalian China in October 2018, <http://finance.jrj.com.cn/2018/10/12145325195636.shtml> For instance, your taking of the multibillion dollar National Security Co. under the auspices of your alleged leader, i.e., Ma Jian, of your organization i.e., Chinese Secret Police Apparatus without paying a penny is for meritorious cause to promote communist China's democracy and "rule by law",

32. Any and all documentary or testimonial evidence which may help you to rebut brother Guo Wencun's committing of brutal tortures against writer Zheng Huang after Huang wrote online blog criticizing Plaintiff in 2012, how you forced Huang to delete his article and issue a written apology, is not an act of corruption, yet it is Plaintiff's whistle-blowing actions to promote "Rule by Law" in China. See <http://finance.sina.com.cn/chanjing/gsnews/2017-04-19/doc-ifyepsra4702100.shtml>

33. The instant case involving your claim for \$5million damages against Defendant and Defendant's \$12,500,000.00 counterclaims; please provide Defendant with any and all documentary or testimonial evidence regarding approximately 200 alter egos entities, including but are not limited to, such corporations, foundations, trusts, derivative trusts, offshore banking

institution, Golden Spring (New York) Ltd.; Spirit Charter Investment Ltd., Arab-China Investment Group., Co. Ltd., Eastern Profit Co. Ltd., Etc.

34. Any and all documentary or testimonial evidence, witness list, expert witness list, which you will use on the upcoming trial;

35. Documents concerning your registration with U.S. Department of Justice as a foreign agent/foreign propagandist on behalf of China pursuant to 1937 Foreign Agents Registration Act.

I hereby solemnly testify under the penalty of perjury of law, Section 603 of the Federal Rules of Evidence and 28 USC 1746, that all the above-presented documents, and all my statements addressing production or reasons in denial of producing of one or more requested and sought for documents are of truth, all but truth, under oath subject to penalty of perjury of law of the United States.

By Wengui Guo, a/k/a, Miles Kwok or Ho Wan Kwok, Deponent

Dated: _____ day of _____, 2019

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2019, I served a copy of the foregoing upon Plaintiff, Wengui Guo through the Counsel for Plaintiff John David Morrissey, via email and first class mail in an sealed envelope, with postage prepaid via USPS: .

Wengui Guo, c/o John David Morrissey, Esq.

Zeichner Ellman & Krause LLP

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s/Ning Ye, Esq.

Counsel for the Defendant

IN THE US DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Wengui Guo, aka Miles Kwok

)

Plaintiff

) Civil Action No. 18-cv-174

V.

)

Yeliang Xia

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Defendant

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PLAINTIFF'S FIRST SET OF REQUESTING FOR ADMISSIONS

COMES NOW Defendant Yeliang Xia, pro se, pursuant to Rule 36 FRCP, in connection to Federal Rules of Evidence, seeking for Plaintiff's Response in the form of Admission or Denial the following questions/statements through mutual discovery being ordered by the Honorable Court.

You must choose either admission or denial as your answer to the formed questions. If you choose not to circle the answer, you must give valid reason(s), justifying or explaining why you refuse to do so and based upon what legal ground(s). Should you refuse to produce without justification or valid reason, you will be compelled to answer pursuant to or facing sanctions, pursuant to and Rule 26, Rule 37 FRCP.

1. You have many alias names that appear in your various legal documents or property title documents, i.e., Ho Wan Kwok, Miles Kwok, Haoyun Guo and such alias or alter egos as “Golden Spring (New York) Ltd., Shiny Times Holding Ltd., Spirit Charter Investment Ltd. Hong Kong Dongli Company Limited; Arab China Investment Co. Ltd. Etc, etc. .

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

2. In the Complaint, you claimed that you have about 491000 followers and boasts the largest number of supporters among Chinese Twitter users because you are a “pioneer of using YouTube and Twitter to fight for the rule by law in Communist China”. You claimed in your complaint that you are the only one who single-handedly challenged the CCP in the CCP’s 70-year rule” (Complaint, p2) and you also alleged that your video speech watched everyday by billions of audience through YouTube, Guo Media, etc. You stated that you have interviewed by the top and most influential media in the world (including NYT, WSJ, Washington Post, AP, Reuters, Time, etc.) therefore you deem yourself as a very influential public figure in both China and the whole world; while claiming to be a “pioneer using YouTube and Twitter to fight for rule of law among others, having unprecedented impact on the international image of the CCP,

and your disclosure has shown the ways the Chinese people are tortured...”, therefore you deem yourself as an outstanding figure in a unique stage who are known to many people in and out of China and your speeches and activities, according to your self-characterization, is of public concern;

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

3. You are now acting in the United States, to engage in such covert operation, using what you pledged in your 08/26/2017 correspondence, your “influence and resource” to advocate and propagandize “Chairman Xi Jinping’s” international agenda and global initiative under the code name of “Chinese dream” as an agent or propagandist for the People’s Republic (PRC), allegedly under your handler(s) in Beijing, which you repeatedly and publicly referred to as your “Leader(s) and Organization” or “laolingdao” while you haven’t registered with the U.S. Department of Justice in pursuant to “Foreign Agents Registration Act”.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

4. You have brought at least 17 law suits mostly targeting leading Chinese dissidents starting year 2018, and threatening to sue several other peers in line, with \$100 million in legal funds you personally established and pledged, and to render them to be preoccupied and bankrupted in two to three years, as you have vowed and announced to public in your most recent talk shows, is such an operation under your initiative as an integral part of your “dedication to Xi Jinping’s Chinese dream on international stage” by using all “your resources and influence” to implement your dedication pledge set forth in your 08/26/2017 letter of allegiance.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

5. You have been accused for allegedly “kidnapping”, “unlawful detention” and “raping” Miss Rui Ma, your former female employee and it was reported by numerous mainstream mediums

with a featured story and you didn't do anything for trying to stop the media's widespread dissemination or demanding in writing for corrections and apology.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

6. On September 1, 2015, according to the complaint filed by Miss Rui Ma, unmarried and in her twenties, you "pulled down your pants and underwear, and began to tear down Miss Rui Ma's skirts and tights, physically battering her in the process."

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

7. On April 6, 2016, after you coerced Miss Rui Ma to drink alcohol with you and get her intoxicated and slept, Miss Rui Ma was "only to be awoken" finding you were "lying on top of her and attempting to forcefully separate her legs. " Miss Rui Ma "yelled at you to stop". Eventually, you "overpowered her, and engaged in non-consensual forced sexual intercourse with" Miss Rui Ma. After your violence, you left Miss Rui Ma alone, bleeding in her bed.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

8. Graphical and vivid description of sexual assault and rapes are quoted from Miss Rui Ma's Complaint against you in civil tort case 158140/2017, and broadly reported by press, yet you are the one who does not admit or give it any credit.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

9. Admit you have publicly announced on November 21, 2017 and advertised that you would pay reward of \$100,000.00 to procure testimony charging such alleged felony as “rape”, “sexual assault” against 8 targeted subjects including Defendant and Teng Biao(a Chinese lawyer of human rights) and Meng Weican (a/k/a Wei Shi, a media publisher) and several more dissidents against CCP, ending up with one alleged victim coming up to you for your promised cash rewards. -See, <https://youtu.be/9fzY7z0bgdw>

(20:00 – 23:20) posted on Nov 21, 2017.

You made such public pronouncement by offering \$100,000.00 for each tip off provided by each woman “victim”;

You did not request that such an offer of victim’s testimony in exchange for \$100,000.00 in cash must be based upon truth;

You did not intend to honor your offered payment of such \$100,000.00 cash at the 1st place, and ended up with your dishonoring \$100,000.00 offer when one female restaurant owner from California volunteered to help you.

You knew that your fishing trip with decoy of \$100,000.00 in trading for perjury will place such eight predetermined targets with label of “sexual predators”, including Defendant, in false light of public humiliation and legal troubles.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

10. On May 1, 2018, you claimed on Youtube that there are altogether 171 transactions you paid to your active supporters.--See, https://youtu.be/_fG6BjfnT6E?t=2238

(37:18--37:44)

In the past two years you gave or promised to give \$1 Million to Zhao Ming and his Australia team, \$170,000 to a Japanese car Xiang Lin and his Japanese team for Car Parade, \$20,000 and other benefits to Guo Baosheng. Your accomplices and flunkies launched cyber personal attack on the targeted dissidents and organized collective slander, libel against those victims including Defendant, you not only provide funding for your gangs, but also provide uniforms and combating caps with your own design of logos which are identical to the logo of your own media, Guo Media. You did not report to U.S. Department of Justice, neither did you report to U.S. Department of Treasury while you are causing such cash flowing from your accounts overseas into the United States, before or after Hong Kong Criminal Court convicted you and your proxies for Money Laundering and confiscated HK Dollars 32.8Billion equalizing U.S. \$4.2billion, neither did you caution to all your lawyers that they must report to U.S. Department of Treasury for taking your large amount of fees in cash wired through international money transfer channels:

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

11. Admit that you have sex with many of your employees including Wang Yanping, Yu Yong, Qu Guojiao, Miss Ding and many more. In August 2010, you tried to rape your employee Chen, who was a secretary at Food Department of Pangu. See, http://news.ifeng.com/a/20170419/50968081_0.shtml

Numerous mediums worldwide, such as Associated Press (AP) published the tort case Miss Rui Ma brought against you for your rape, among other alleged offenses, you did not write to these presses requesting for corrections because you knew that accusation was based on the facts.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

12. In the letter of allegiance on August 26, 2017, you declared publicly that you are a staunch supporter of Chinese communist dictator Xi Jinping, and you pledged to your leader and your organization that you would dedicate your life to safeguard Xi and use your resources and influence to help propagandize Xi's "Chinese dream" on international stage. You did that in the aim of returning to China and avoid possible punishment with your potential outstanding merits and achievements to sabotage overseas Chinese movement of democracy by attacking and smearing the dissidents and activists.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

13. Before August 26, 2017, you secretly received Liu Yanping at your New York residence, who was then a minister level official from China's Ministry of State Security (MSS, which is similar to KGB of former Soviet Union) who sneaked into the United States as a visitor by concealing his real identity with communist China's secret police apparatus, you and Liu had a lengthy discussion in covert operation; After your secret meeting, Liu was briefly detained at his exit at JFK Airport and later released. You hinted in your video speech that you reported to FBI and CIA since Liu didn't agree on your requests.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

14. In your Complaint, you define yourself as a “political dissident”. Yet in a broadly publicized letter of allegiance dated August 26, 2017 to Chinese authority and its tyrant Xi Jinping to whose domestic and global agenda, namely, “Chinese dream”, you explicitly expressed you would mobilize your resource and influence on the international stage to make your contribution, the recipient of your loyalty and service, what you referred to as “the leader(s) and organization, included Liu Yanping; Ma Jian; Zhang Yue, while so-called “organization” is Chinese secret police apparatus, namely, “The Ministry of State Security(MSS)”, among others. You have alleged that you have been working for MSS and got the first-class merits from MSS for three times, it means you made an extraordinary contribution to MSS and CCP. In the result, people may correctly call you as a special agent, an espionage or a spy served CCP and MSS in China.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

15. Shortly after your loyalty pledge with the letter of allegiance on August 26, 2017 to Chinese authority and its tyrant Xi Jinping to whose domestic and global agenda, namely, “Chinese dream”, you have actually honored your loyalty pledge by mobilizing your “resource and influence” on the international stage to start a long line of frivolous legal actions placing approximately 20 Chinese dissidents on exile in 16 defamation suits in U.S. Courts from coast to coast. The skyrocketed fees and cost of all these litigations are paid by your “leader(s)” and your “organization”, because you recently alleged that you are a poor man with “minus assets”, no job and no income in the past 4 years since your stay in the United States and literally living on loaned money for your luxury life, “a team of private guards consisting of retired Seal soldiers and policemen” according to your own introduction.

From time to time you alleged that you enjoy special protection including snipers on the roof of neighboring high-rise buildings and crews of Secret Service working for US president and you even showed a badge of Secret Service pinned in your chest of suit during your video speech, thus you proved in public that you are a VIP with the privilege under protection of Secret Service with approval of US president.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

16. The official language being used in U.S. Courts is English. You are completely illiterate in English Language and barely literate in Chinese written language; therefore, all your efforts to serve the dictator Xi Jinping and his flunkies as Ma Jian, Liu Yanping, by propagandizing

“Chinese dream” on “international stage”, virtually an English-speaking world, must be relying on translator/interpreter’s assistance. Because you are a poor man with no job or income in the United States, therefore, your Beijing based “leaders” and “organization” provided you with such effective communication helpers like Ms. Wang Yanping (who claimed herself as a long-term active member of CCP and it’s unclear if she has ever confessed that identity to USICE) to you free of charge, serving you day and night.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

17, Before your departure from China in later 2014, you were corroborated with your superior within what you pronounced “the organization”, Mr. Ma Jian, your close partner and one of your “leaders”, 1st Deputy Minister of the Ministry of State Security, in having engaged in series of expropriation of several multi-billion dollar private enterprises empty-handedly, at the cost of the long list of victims who barely survived jail term witnessing all his hard earned properties were taken by you and Mr. Ma Jian for free. Not all victims falling into the hands of Chinese Secret police were as lucky as Mr. Qu Long, whose disclosure was corroborated by former Deputy Minister Ma Jian’s publicized Confession through CCTV.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

18. With your 08/26/2017 Loyalty service pledge in place to mobilize your resource and influence on international stage to advocate and propagandize your maximum leader’s “Chinese dream” agenda, you repeatedly and boldly advertised, announced, and publicized advertisements, calling for all female victims to stand up, to speak out their grievance of being sexually assaulted, raped, or molested by Defendant Xia Yeliang, Xiong Xianmin, Li Weidong, Liu Gang, and Teng Biao whom you allegedly call him as “the incest Biao” (you named Teng as “Luanlun Biao”), by offering \$100,000.00 to procure each woman’s story of being sexually assaulted as ultra-generous reward. Because you testified under oath that you are a poor man with no legitimate or ethical job or income in the United States, your cash rewards are funded by your Beijing based “leaders” and “the organization”;

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

19. With your 08/26/2017 Loyalty service pledge in place to mobilize your resource and influence on international stage to advocate and propagandize "Chinese dream" agenda, at least one woman answered your advertisement and public announcement of \$100,000.00 reward by fantasizing, fabricating a false story of being "sexually molested" by "Professor Xia Yeliang", completely a stranger to her, in her California Restaurant. That woman demanded for what you had offered \$100,000.00 for her cooperative service of "testimony" in your need; The woman ended up getting paid for only \$10,000.00. The fact indicated that did not plan to honor your promise of \$100,000.00 at the first place when you made public announcement for procuring perjury by bribery;

Now you still believe the story told by alleged victim of sexual molestation is true, and you deny any fabrication or perjury/ subornation perjury, you promise to provide solid evidence, verified proof, medical test and diagnosed results, and witness in this court and you are willing to be punished with compensation of three million USD for the general defamation and malicious harm on Defendant.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

20. You entered into a controversial \$9-million contract with Las Vegas based Spying, Detective and Investigative Firm, namely, Strategic Vision USA LLP (SV) , in December 2018, inducing and coercing the firm, according to their pleading paper, to engage in unlawful spying on many of ultra- sensitive people, whom you do not even know, who are under the protection of the U.S. Government among these targeted persons in you submitted hitting list.

One million USD was wired to the SV from Hong Kong under your instruction before the contract was even executed. At the time, all assets of yours, or in your alias or your alter egos were seized and forfeited because you were convicted for a felony of money laundering judged by the local court. Hence the money paid to SV was from "leader" and "organization" to hit all the targeted people including this Defendant because you are a poor man with no legitimate job and income and living on loans and squander on loans. You are a unique guy in the world since you can always squander on loans and you never worry about how to return and compensate the loan lenders.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

21. You sent several classified documents with “absolutely confidential” mark to Mr. Bill Gerts in order to honor your pledge of “resource” and “influence” on U.S. government’s decision making. You alleged that you have burnt three documents with top confidential classified marks in fury in the public bathroom during a press conference held in Washington DC. You insist that you have never purchased or provided funding for fabricating fake documents that assumed leaking from the top leaders in China. You can always get the top confidential document from the top leaders as you demanded.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

22. It is you who disseminated rumors via your widespread video speech through internet that Defendant has such sexually transmitted disease as HPV, herpes, Aids, etc. and has caused many women into metrocarcinoma, cervical cancer, HPV, Aids, etc. You have solid evidence, proof, medical test results and witness supporting your public statement and you are willing to be punished with compensation of five million USD for the defamation per se if you can’t provide solid evidence, verified proof, medical test and diagnosed results, and witness in this court.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

23. It is you who disseminated rumors globally that Defendant is a “beast” rather than a “professor” according to what you alleged one female student of “Peking University” angrily condemned Defendant to sexually assaulted her, and you alleged that the female student has contacted you and provided with evidence for the accusation. You promise that the alleged female student would appear as a witness or provide solid evidence, proof and witness in this court and you are willing to be punished with compensation of two million USD for the general defamation if you can’t provide solid evidence, verified proof, medical test and diagnosed results, and witness in this court.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

24. It is you who publicly pronounced and threatened that you would institute unspecified severe consequences against Defendant's son and children of such other dissidents as Xianmin Xiong, Meng Weican and "Incest Teng Biao", etc.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

You planned and declared to revenge and maliciously harm the children of your targets and defendants who are chained into the lawsuits you initiated, your scheme and action has gone far beyond the ethical norm in a civilized society. You don't care public feelings and would go on with your revenge no matter what consequences might follow your irrational misconducts.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

25. In the long list of 92 names presumably including this Defendant, that you provided to Strategic Vision US LLP, to induce the latter to engage in what latter alleged "criminal activities" in consideration of \$9 million service fee including \$1million being paid by you 4days before signing of the contract, from ACA Capital Group's Hong Kong account on 01/02/2018, more than 60 people, i.e., the super majority of Defendant's peers, you did not have any personal acquaintance, knowledge, or relevance.

Also under "China Dream", you covert action in the United states include, yet not limited to, to get information of 92 victims under your projected tracking through SV's assistance to locate their accurate whereabouts by "geolocations", traveling plans at real time, decoding and illegal access "remotely" into their real time electronic communication in violation of USDOS's "Protected Records" and other U.S. anti-espionage Law, anti-terrorist law, is to help your handler's grand conspiracy by distortion and/or to help Arabic terrorist attacks on these targeted subjects for planning and implementation in accuracy.

Admit ()

Denial ()

Declined to answer ()

Reason to Decline:

Declaration

I hereby solemnly testify under the penalty of perjury of law, Section 603 Federal Rules of Evidence, and 28 USC 1746, that all the above-presented documents, and all my statements addressing production or reasons in denial of producing of one or more requested and sought for documents are of truth, all but truth, under oath subject to penalty of perjury of law of the United States.

By Wengui Guo, aka, Ho Wan Kwok, Deponent

Subscribed and sworn to before me on this _____ day of _____, 2019.

Notary public:

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2019, I served a copy of the foregoing upon Plaintiff, Wengui Guo through the Counsel for Plaintiff John David Morrissey, via email and first class mail in an sealed envelope, with postage prepaid via USPS: .

Wengui Guo, c/o John David Morrissey, Esq.

Zeichner Ellman & Krause LLP

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s/Ning Ye, Esq.

Counsel for the Defendant

IN THE US DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Wengui Guo, aka Miles Kwok)	
Plaintiff)	Civil Action No. 18-cv-174
v.)	
Yeliang Xia)	
Defendant)	

DEFENDANT'S INTERROGATORIES

COMES NOW the defendant Yeliang Xia, by and through his undersigned defense counsel, pursuant to Rule 26(b), Rule 33 Federal Rules of Civil Procedures, and in connection to Federal Rules of Evidence, instruction of the Court, seeking for answers to the following enumerated questions through mutual discovery being ordered by the Honorable Court. You must honestly answer these questions under the penalty of perjury of law. If you choose not to answer certain question(s), you must give valid reason(s), justifying or explaining why you refuse to answer and based upon what legal ground(s). Should you refuse to answer without justification or valid reason, you will be compelled to answer pursuant to or facing sanctions, pursuant to Rule 37, Federal Rules of Civil Procedures, and Rule 26 and Rule 37, Federal Rules of Evidence §603. AND Local Rule 37(A):

INTERROGATORIES

1. What is your legitimate occupation and amount of salaries or lawful income from any legitimate sources in the United States since your entry of this country in earlier 2017?

Answer:

2. What is your legitimate income in the United States that has enabled you to pay your skyrocketed legal fee, fee for private investigators, fee to pay for bodyguards, for purchasing art workers, to pay your maintenance of private jet, cruise, luxury Manhattan Condo, and all other such ultra-expensive lawyers of David Boies, Aaron Mitchel; Daniel Steinberg, and a long line of other legal counsels and to pay such ultra-expensive fee to Strategic Vision in Las Vegas, if you don't have any legitimate income in the United States since February 2017?

Answer:

3. Did you publicly claim repeatedly that you are a U.S. citizen. Was such a public statement truthful or knowingly fraudulent? On what factual or legal basis are you allowed to make such a public statement intentionally and repeatedly?

Answer:

4. On what basis and allegation were you convicted by Hong Kong criminal Court which seized and forfeited, simply put, confiscated you HK Dollars 32.8 billion equalizing US\$4.2Billion recently as an outcome of a criminal conviction for felony of "money laundering"? Do you agree to Hong Kong Criminal Court's judgment? What is your version of defense, if any, against such felony conviction followed with the criminal court enforced seizures and forfeiture?

Answer:

5. What is your current legal status in the United States? List eleven other countries which allegedly issued your 11 passports as you claimed in your video speech, and state a passport which you entered into USA with, and list the name of the lawyer from U.S. Immigration who told you to claim that you had been a U.S. citizen,. When, where, and who let you tell such lie repeatedly to general public in the United States.

Answer:

6. It is broadly reported that when you were deposed by Defendant Guo Baosheng in a separate case, you stated under oath that you have no money and live on loaned money, does that mean you are a poor man living in red while such prohibitively expensive lawyers are paid by cash transferred through different international channels whose backgrounds are yet to be disclosed by you from the ultimate financial source on the side of your alleged "leaders" and your "organization" in the Far East and Middle East, before and after Hong Kong Criminal Court's conviction and confiscation of \$4.2 billion of convicted money laundering against you and your co-conspirators? Based upon the same financial source not of yours, but of your foreign handlers, you have recently declared that you would sue other number of projected defendants with the help of high roller litigating lawyers? Has such a transferred cash to cover Attorney fees been reported to U.S. Department of Treasury or U.S. Department of Justice?

Answer:

7. Has there been any alleged female victim who sued you in the New York Supreme Court for alleged rape, among other causes of action (Index 158140/2017)? According to AP news agency and other U.S. leading mainstream media reports as well as the New York Supreme Court docket, Miss Rui Ma accused you to tear down her skirt and tights, climbed on top of her, separate her

legs, and overpowered her to accomplishing sexual intercourse. If Miss Rui Ma's allegation and graphical description is true, how do you describe your behavior and activities on the top of Miss Ma?

Answer:

9. After those media reports on alleged "rapes" with vivid and graphical description followed with legal actions filed "rape victim" Miss Rui Ma against you for alleged "rapes" and "kidnapping", have you, or any legal counsel, from the massive fleet of counsels you have hired and paid, issued any demands for these media of publicity for corrections, apology? If so, please present proofs; If not, why not?

10. After those media reports on alleged "rapes" with vivid and graphical description followed with legal actions filed "rape victim" Miss Rui Ma against you for alleged "rapes" and "kidnapping" in case 158140/2017, have you, or any legal counsel, from the massive fleet of counsels you have hired and paid, filed any motion with the New York Supreme Court to "suppress improper, impertinent, defamatory statement in Plaintiff's Complaint", or having filed any counterclaims, or initiated any defamation action against Complainant Miss Rui Ma? If not, why not?

11. While apparently that is highly unlikely your alleged signature activities to promote "rule by law" of Chinese character, in absence of your demand for corrections, for suppression, and for apology from the Media, as well as from Miss Rui Ma, through her counsel, what is your version of explanation about your activities on the top of Miss Rui Ma, after her allegedly being stripped off?

12. In complete absence of your demands for corrections and for apology from the Media, and in absence of your counter actions against Miss Rui Ma's graphical charge of rape, then what will be ordinary people's naturally instinctive, and reasonable inclination to interpret your alleged activities on the top of Miss Ma?

13. List the names, addresses, emails and social media accounts of all the people you mobilized, paid, and lured to support your secrets exposure "revolution" against selected characters(so-called "Baoliao Revolution") since 2017.

Answer:

14. You wrote a letter in explicit expression of your allegiance on 08/26/2017 to your "leader(s)" and your "organization", stating that you want to utilize your "resource" and "influence" to help advocating and propagandizing China's totalitarian dictator Xi Jinping's global agenda under the code name of "China dream" on "international stage", what did you mean "the organization"? Does your "organization" include such Chinese secret police apparatus as the Ministry of the State Security (MSS) of the PRC? Did such "organization" mean or include Ministry of State Security(MSS) and military intelligence agency. If not, what "organization" you were talking about? In your 08/26/2017 Letter of Allegiance, you also talked about your "leaders". Do such leaders include, yet not limited to, Mr. Ma Jian, the 1st Deputy Minister of the Ministry of State Security; Gao Hui, a staff of the Ministry of State Security; Liu Yanping, Secretary for discipline inspection of the Ministry of State Security. If not, who are these leaders? Did they play any role in prompting, ordering or directing you in all 17 defamation litigations from coast to coast?

Answer:

15. You wrote a letter of allegiance on 08/26/2017 to your "leader(s)" and your "organization", stating that you want use your "resource" and "influence" to help advocating and propagandizing China's maximum leader Xi Jinping's global agenda as of "Chinese dream" on "international stage". Where is such "international stage" you were talking about? What are the "resource" you would like to dedicate? Specifically to whom you want to dedicate? What is the nature of your affiliation with your leaders and your "organization"? Are all these covert operations ranging from frivolous legal actions, conspiracy with SV Firm to spy on 92 targets in your hitting list, to your fishing trip to set up Defendant in sexual assaulting scandals or triggering felony prosecutions, are part of your "dedication"?

Answer:

16. Are those of your leaders including Liu Yanping, the minister level official of MSS, whom you referred to USDOJ as a "friend of yours" ? your partner Ma Jian, former first deputy minister of China's MSS, who referred to your name and many names as of being the victims under Ma Jian-Guo Wengui alliance, in his recent confession? Are these "leaders" from their "organization" you referred to in your 08/26/2017 letter also involved in ACA Capital Group Ltd. The former's unpublished co-founders together with you and your Arabic friends, the front runners?

Answer:

17. You wrote a letter of allegiance on 08/26/2017 to your “leader(s)” and your “organization“, stating that you were coerced to “disclose internal information” in return for U.S. government’s offer of special protection for the sake of your survival, therefore you were talking about what you did not mean to talk without crossing the “red line”, what does it mean such a “red line” you pledged to your leader(s) and your organization you would not to cross?

Answer:

18. In your letter of allegiance on 08/26/2019 (five-pages Correspondence) to “leader(s) and “organization”, you wrote your exposures of the CCP’s corruption was done under the duress in exchange for U.S. government’s special protection of your safety. If you cease such exposure, such protection would be withdrawn and you would face imminent life threatening risks. You stated in that 08/26/2017 letter of allegiance that you did not make an honest “exposures” while speaking what you really did not mean to speak. Therefore, have you made it clear that your “exposure revolution” was actually cheating the U.S. government and People of the United States in response to duress imposed upon you by the government of the United States? If not, who coerced you to continue your exposures? Why did you say to your leaders and organization that the United Kingdoms offered to you more freedom of decision and better living conditions? You also mentioned in your 08/26/2017 Letter of Allegiance to the People’s Republic, you revealed to your “Leaders” and to your “Organization” that you exposures would not cross the “red line”, what “red line” did you mean ?

Answer:

19. You passed several what you “meant” to be classified CCP inner circulars of absolute confidentiality to Mr. Bill Gertz of the Washington Beacon, were these so-called “classified CCP inner circulars” were also within the category of “not you exactly meant” under the pledge of “not to cross red line”?

Answer:

20. You vowed in your letter of allegiance on 08/26/2017 (five-page signed correspondence) to your “leader(s)” and your “organization” that you would dedicate your life to safeguard Secretary general and President Xi Jinping, what was your implementation plan to honor such of your oath? Does that mean all your covert actions in the United States by tracking on USDOS

protected people to coast-to-coast massive litigation against Pro-democracy activists to ensure their silence are part of your dedication putting your life at stake?

Answer:

21. Have you registered yourself as a foreign agent/foreign propagandist with the U.S. Department of Justice pursuant to U.S. Foreign Agent/Foreign Propagandist Registration Act? If not, why not?

Answer:

22. On what factual basis you are so confident to tell the public that Defendant has HPV, a sexually transmitted disease?

Answer:

23. For what reason did you make a cash payment to that Female California Restaurant owner who accused that Defendant "sexually molested" her? What is the relevance between her allegation of being "molested" by Defendant?

Answer:

24. On what factual basis that enables you to make such a public statement that Defendant is a "beast" rather than a "professor", of Peking University?

Answer:

25. On what factual basis you are so confident to tell the public that if you were not able to cause Mr. Xianmin Xiong (a/k/a "Sino"), and Mr. Meng Weican (a/k/a Wei Shi) be jailed in U.S. Prison by the end of 2017, you would commit suicide by jumping off from your 18th floor apartment through the window? Given to the fact that nothing has happened to both Xiong and Meng until this moment, March 20, 2019, did you plan to honor your words by jumping off the building from 18th floor? If not, what is your version of explanation.

Answer:

26. On what background or financial back up that makes you feel so confident to tell the public that if you were able to inflict great troubles to the children of Mr. Xia, Mr. Xianmin Xiong (a/k/a "Sino"), and Mr. Meng Weican (a/k/a Wei Shi), with the assistance to engage what Strategic Vision US LLP argued "criminal activities" in the accuracy of those children's "geolocations"?

Answer:

27. In the Complaint, you told this Hon. Court that you are a political dissident. On what factual basis that you told the audience in a public video interview on May 4, 2017 that you had been an agent working for MSS (the secret police apparatus in China) overseas and won the first place award for three times, and you also stated that you spent 300 million (you didn't state clearly whether it is RMB Yuan or USD) on the cost of flights to see His Holiness Dalai Lama, and successfully intercepted and undid His Holiness' scheduled visit to UK. Assuming you spent U.S. Dollar 300 million to derail His Holiness' UK visitation, in exchange for an MSS first place medal, who finally paid such expenses you had reported? Was Mr. Tony Blair the contributory element in ruining His Holiness' UK visitation? How much compensation did you get from the MSS in addition to first Place medal for your successful PR with British signatories on behalf of the MSS?

Answer:

28. Can you give an explanation why you are interested in tracking on this Defendant and 91 other VIP people in your conspiracy with Strategic Vision USA LLP by urging the latter to "engage in criminal activities", since most of those people on the hitting list you said you have never met or leant and would highly unlikely meet, encounter or know about though out your life time, the question comes up who had thrust such a hitting list in your palm? China's MSS, Military intelligence agency or terrorist underworld of the Middle East? If none of the above, please explain why you get involved?

Answer:

29. What was and still is your relationship with the 1st Deputy Minister Ma Jian? Deputy Minister Liu Yanping? With Arab-China Capital Group Limited which rushed to wire \$1 Million, following your instruction, from its HK account to SV in the United States on 01/02/2018, 4 days before signing of the contract?

Answer:

30. What is the computational basis upon which you are seeking for \$5million damages to compensate your and your family's sufferings from Defendant's alleged "unrestricted warfare" of alleged "defamation"

Answer:

31. In Complaint, you stated that Bruno Wu Zheng, a "professional spy trained by China", called you and requested that you "cooperate with the CCP" in December 2014, which you caused to get published by Mirror Video Station(Complaint p12); How did you know Wu was "professionally trained spy" if you yourself is not? While knowing Mr. Wu is a professionally trained CCP spy, why did you talk to him at length and accept Bruno Wu's assignment from the Summit CCP "organization" that you kept tracking and surveillance upon such an ultra-sensitive, VVIP Chinese fugitive Mr. Cheng Wang (real name: "Ling Wancheng") using professional spying firm?

32. You displayed your displeasure in your Complaint in accepting Bruno Wu Zheng's assignment for you to continue tracking Mr. Cheng Wang for his geolocations at real time, then why in January 2018, your assignment for spying on, tracking and surveillance upon the world's most sensitive persons list has been enlarged for at least 30 to 90 times greater, smelling much much worse in comparison to your CCP assignment through Mr. Bruno Wu Zheng in December 2014?

33. If your claim that you are "supported by more than 100 million people in Mainland China" for you "single handedly challenge the CCP rule in 70 years", while having 491,000 viewers through YouTube, Guo Media and Twitter, and 3.8 billion impressions by your Twitter account, 10 Million supporters outside China, isn't it accurate to characterize you as a public figure and what you "single-handedly challenged" is the matter of public concern?

34. In the Complaint, you stated that in May 2017, the Secret police apparatus of the People's Republic "sent Liu Yanping", (Complaint p14) the deputy Minister, and other three agents apparently with willful concealment of their real identities to secretly meet you in New York City with your help harboring these top level agents, and briefly arrested at the JFK Airport. In the meantime you proudly declares that in May 2017, your Twitter Account reached 3.8 billion impressions; (Complaint p14) . After Mr. Liu's 05/2017 secret meeting with you followed with

your 08/26/2017 Letter of allegiance, followed with your wild campaign in three way persecution against dissidents, your public support has now dropped down to almost a zero level, can you explain for what is the ultimate reason that drives you to make such a choice to such a self- destruction?

Declaration

I hereby solemnly testify under the penalty of perjury of law, Section 603 Federal Rules of Evidence, and 28 USC 1746, that all the above-presented documents, and all my statements addressing production or reasons in denial of producing of one or more requested and sought for documents are of truth, all but truth, under oath subject to penalty of perjury of law of the United States.

By Wengui Guo, aka, Ho Wan Kwok, Deponent

Subscribed and sworn to before me on this _____ day of _____, 2019.

Notary public:

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2019, I served a copy of the foregoing upon Plaintiff, Wengui Guo through the Counsel for Plaintiff John David Morrissey, via email and first class mail in an sealed envelope, with postage prepaid via USPS: .

Wengui Guo, c/o John David Morrissey, Esq.

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